

**PUGET SOUND AIR POLLUTION CONTROL AGENCY**

110 Union Street, Suite 500, Seattle, Washington 98101-2038

Fax: 206-343-7522

RECEIVED

NOV 4 1997

AGCW-SEATTLE

Registration No. 11339

Case No. \_\_\_\_\_]

**COMPLIANCE STATUS REPORT**

Date of Report October 30, 19 97 at \_\_\_\_\_ .m.

Source Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldback</u>
Location <u>3801 E. Marginal Way So. Seattle, WA. 98134</u>	

☒ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☐ During my inspection I noted the following deficiencies:

No deficiencies were noted on your September  
1997 CEM report.

The maximum hourly average opacity of 5.2%  
that you reported on 9/8/97 and 9/17/97  
are below 5.5% and thus they are not  
violations of the Reg I 9.09(b)(2) standard

~~Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.~~

Issued by: Charles J. Silva

Received by \_\_\_\_\_

11/3/97  
umx  
Signing this is not an admission of guilt

**PUGET SOUND AIR POLLUTION CONTROL AGENCY**

110 Union Street, Suite 500, Seattle, Washington 98101-2038

Fax: 206-343-7522

Registration No. 11339

Case No. \_\_\_\_\_

**COMPLIANCE STATUS REPORT**

Date of Report Feb 5<sup>th</sup>, 19 99 at 8:45 a.m.

Source Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldback Mgr.</u>
Location <u>3801 E. Marginal Way So. Seattle, WA 98134</u>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☒ During my inspection I noted the following deficiencies:

Regulation 7.09 (b) O&M requirement for Title 5 Sources: Please review and update the facility operations and maintenance plan to include the date and time of emissions observed, the cause of the emission and the corrective action taken as well as the time the emission ceased. Document this information for all baghouses and fugitive dust emission points such as the clinker storage shed. Additionally, please keep O&M records on the following equipment: The Raw mill, the tire feeder and the Coal mill as their operation contributes to emission reduction.

Reg. I 9.15 (c) Please report the corrective action taken regarding the dust emissions from the clinker storage roof monitor broken door observed on 2/3/99 by inspector mm. Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

Issued by: [Signature] Received by: [Signature]

Signing this is not an admission of guilt

# ASH GROVE CEMENT COMPANY



"WESTERN REGION"

April 26, 1999

Elizabeth Gilpin  
Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle WA 98101-2038

Dear Ms. Gilpin:

**Re: Compliance Status Report Dated 02/05/99**

The following is further information as you requested on fugitive dusting noted from our clinker shed penthouse.

**February 3, 1999:**

On February 3, fugitive dust was noted coming from the door of the penthouse on the Clinker Shed. That night, the door to the penthouse was cleaned and closed properly to better seal the penthouse. On February 5, the duct work for drafting the penthouse was inspected and found to be restricted due to built up material. This was cleaned to allow proper drafting.

Sincerely,

J. Trygve Grey  
Process Engineer

**PUGET SOUND AIR POLLUTION CONTROL AGENCY**

110 Union Street, Suite 500, Seattle, Washington 98101-2038

*Cert. Mail No. 2580039272* Fax: 206-343-7522

Registration No. 11339

Case No. \_\_\_\_\_

**COMPLIANCE STATUS REPORT**

Date of Report September 23, 19 98 at \_\_\_\_\_ .m.

Source Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldback</u>
Location <u>3801 E. Marginal Way So. Seattle, WA. 98134</u>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☒ During <sup>our review of your July 1998 CEM report</sup> my inspection I noted the following deficiencies:

As reported in your July 1998 CEM report,  
A violation of Reg I 9.04 (c)(1) > 5%  
opacity 1 hr Average from the main stack  
on July 18 1998.

No corrective action required as your response was  
included in the 7/98 CEM report. This determination  
is based on the 9/10/98 interim CEM policy which  
has not been approved by the board and which is  
subject to change.

Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

Issued by: *[Signature]*

Received by \_\_\_\_\_

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*9/29/98*

# PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington, 98101-2038  
Fax 206-343-7522

Registration No. 11339

Case No. \_\_\_\_\_

## COMPLIANCE STATUS REPORT

Date of Report 10/16, 19 98 at \_\_\_\_\_ m.

Source Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldbaek Mgr.</u>
Location <u>3801 E Marginal Way So. Seattle, Wn 98134</u>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☐ During my inspection I noted the following deficiencies:

August 1998 CEM report no deficiencies  
noted.

\_\_\_\_\_  
\_\_\_\_\_  
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Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

Issued by

Form No. 70-182

(7/1/93)

Received by

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AGCS2M000468



# PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington, 98101-2038

Fax 206-343-7522

OCT 30 1998

CERT MAIL NO 580 938 810

ALLOW-SCANNING

Registration No. 11339

Case No. \_\_\_\_\_

## COMPLIANCE STATUS REPORT

Date of Report <sup>CEM</sup> May, 19 98 at \_\_\_\_\_ m.  
*Reviewed 10/23/98*

Source Name <u>Ash Grove Cement Co</u>	Responsible Person, Title <u>Henrik Voldbaek, PMgr</u>
Location <u>3801 E. Marginal Way S</u> <u>Seattle, WA 98134</u>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☒ During my inspection <sup>of May 1998 CEM report</sup> I noted the following deficiencies:

- <sup>Per Reg I Section 12.03(a) + (b):</sup>  
 ① Missing data for SO<sub>2</sub> + CO monitors for 7.45% of operating time on 5/12, 5/13, 5/22 and 5/23/98 and for NO<sub>x</sub> monitor for 25% of operating time on May 11-19, 22-23, and 28, 1998. Please provide a complete explanation of how downtime may meet Reg I Section 12.03(b)(1), if appropriate. The Agency reserves the right to take further enforcement action if needed.  
 ② Per Reg I Sections 9.09(b)(1) + (2), violations of opacity standards were reported for 5/25/98 and 5/27/98 13% of operating hours. No corrective action required as response included in CEM report. This determination is based on the 9/10/98 interim CEM plan which has not been Board approved + is subject to change.

Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

Issued by

10.29.98

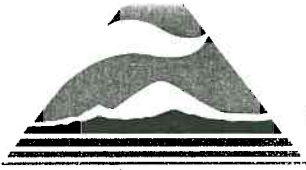
Form No. 70-182

(7/1/93)

Received by

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AGCS2M000469



PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY    KITSAP COUNTY    PIERCE COUNTY    SNOHOMISH COUNTY

December 18, 1998

Registration No. 11339

Mr. Henrik Voldbaek  
Ash Grove Cement Co.  
3801 E. Marginal Way S.  
Seattle, Washington 98134

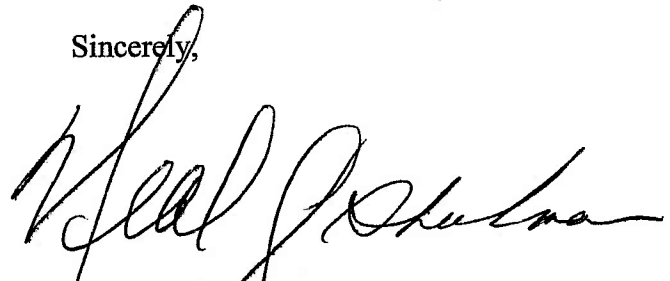
Dear Mr. Voldbaek:

**Disposition of Notice of Violation No. 36679**

Based on the information you provided to us in your corrective action letter dated November 10, 1998, this Agency considers the above-referenced matter closed and will take no further enforcement action in this case.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,



Neal J. Shulman  
Manager - Inspection

EMG:VJD

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Margaret Pageler, City of Seattle, Board Chair  
Janet Chalupnik, Member at Large  
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton  
Dave Somers, Snohomish County Council  
Ron Sims, King County Executive

Brian Ebersole, Mayor, Tacoma  
Charlotte Garrido, Commissioner, Kitsap County  
Doug Sutherland, Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038

(206) 343-8800

(800) 552-3565

FAX: (206) 343-7522

AGCS2M000470

# ASH GROVE CEMENT COMPANY



"WESTERN REGION"

November 5, 1998

Ms. Melissa McAfee  
Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle, WA. 98101-2038

Re: Compliance Status Report request for May 1998.

Dear Ms. McAfee:

The above requested an explanation on how monitor downtime in May 1998 might meet Regulation I Section 12.03 (b)(1). I am assuming the regulation you cite is found in the amended sections of Article 12 that became effective June 1, 1998. Although I am not sure that it is applicable, Section 12.03 (b)(1) exempts the data recovery requirement for periods of monitoring system downtime.

The May CEM report explains that all analyzer downtime for the month was related to a catastrophic failure of the Monitor Labs 8940 NOx analyzer. This failure effected the entire system since all three analyzers (NOx, SO2 and CO) share a common sample line. Isolating one analyzer to for maintenance requires the shutdown of the other two in the system.

Additionally, The May 1998 CEM report included a explanation and a maintenance history for the 8940 NOx analyzer to demonstrate proper maintenance was on going. PSAPCA was appraised at the time of the system failure and of the remedial efforts then underway.

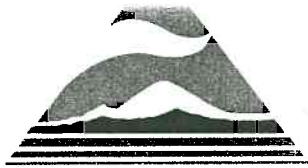
I hope this explanation is sufficient but if you have additional questions, please advise.

Yours truly,

Gerald J. Brown  
Manager Safety and Environmental

Copy: HV  
TG





PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY    ▲    KITSAP COUNTY    ▲    PIERCE COUNTY    ▲    SNOHOMISH COUNTY

December 18, 1998

Registration No. 11339

Mr. Henrik Voldbaek  
Ash Grove Cement Co.  
3801 E. Marginal Way S.  
Seattle, Washington 98134

Dear Mr. Voldbaek:

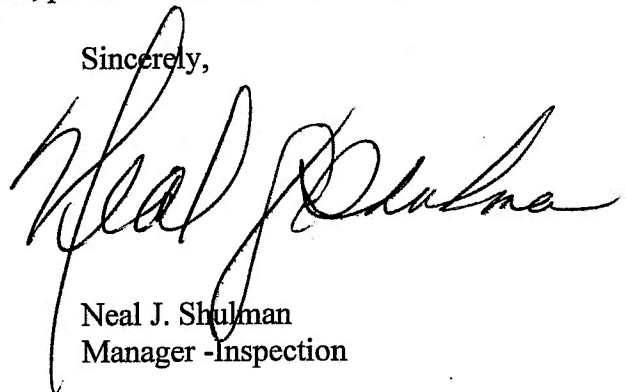
**Disposition of May 1998 Compliance Status Report**

Based on the information you provided to us in your corrective action letter dated November 5, 1998, this Agency considers the above-referenced matter closed and will take no further enforcement action in this case.

In the future, please examine the configuration of your sample line system for your CEMs to enable you to take one monitor off-line for maintenance and keep the other two on-line. This will provide a demonstration that the monitor down time was not a result of inadequate design per Regulation I, Section 12.03(b)(1).

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,



Neal J. Shulman  
Manager - Inspection

EMG:VJD

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

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**AGCS2M000472**

# ASH GROVE CEMENT COMPANY



"WESTERN REGION"

June 23, 1998

Ms. Melissa McAfee  
Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle, WA. 98101-2038

Re: Notices of Violation No. 36713

Dear Ms. McAfee:

The above NOV requires a response describing the corrective to prevent a reoccurrence.

The Addendum to the March 1998 CEM report describes the SO<sub>2</sub> event which was caused by a lack of lime in the main sorbent bin. To reduce the possibility of running out of sorbent, weight cells will be installed on the sorbent bin to increase inventory accuracy. This measurement will be read in the control room and allow for ongoing monitoring of available sorbent and the rate at which it is being used..

Installation of the weight cells will be accomplished in July and the system should be fully operational by the end of August 1998.

Please call me should you require additional information.

Yours truly,

Gerald J. Brown  
Manager Safety and Environment

cc: Henrik Voldback

# PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington 98101-2038

Fax: 206-343-7522

DEC 28 1998

AGCW-SEATTLE

Registration No. 11339

Case No. \_\_\_\_\_

## COMPLIANCE STATUS REPORT

Date of Report December 17, 19 98 at \_\_\_\_\_ m.

Source Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Gerald Brown EH&amp;S Mgr.</u>
Location <u>3801 E Marginal Way So. Seattle, WA. 98134</u>	

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☒ During my inspection <sup>of the September '98 CEM report</sup> I noted the following deficiencies:

a) Reported Violations Occurred as follows:

Date	Pollutant	Regulation/Permit Condition
10/1 9/1	Reg I Opacity	Reg. I 9.04 (c)(1)
10/1 9/1	Opacity	Reg. I 9.04 (c)(2)
10/4 9/4	Opacity	Reg. I 9.04 (c)(1)
10/4 9/4	Opacity	Reg. I 9.04 (c)(2)
10/5 9/5	Opacity	Reg. I 9.04 (c)(1)
10/5 9/5	Opacity	Reg. I 9.04 (c)(2)
10/29 9/29	NOx	N/C 7381 5(b)
10/30 9/30	NOx	N/C 7381 5(b)
10/14 9/14	Opacity	missing Data 2 hr Reg. I 12.03(b)
10/8 9/8	SO <sub>2</sub>	missing Data 4.5 hr Reg. I 12.03(b)
10/10 9/10	SO <sub>2</sub>	5 hr.
10/24 9/24	SO <sub>2</sub>	4.25 hr.

OK  
w/ R.I.  
12.03 (b)  
95% data  
capture

Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

These determinations were based on the 9/10/98 EPA interim CEM civil penalty policy which has not been board approved & which is subject to change

Issued by: \_\_\_\_\_

Received by: \_\_\_\_\_

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## **ARTICLE 9: EMISSION STANDARDS**

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### **SECTION 9.03 EMISSION OF AIR CONTAMINANT: VISUAL STANDARD**

*Adopted 03/13/68 (12)  
Revised 07/08/70 (126), 04/11/73 (186), 06/09/88 (621) 05/11/89 (643), 09/08/94 (798), 04/09/98 (865)*

- (a) It shall be unlawful for any person to cause or allow the emission of any air contaminant for a period or periods aggregating more than 3 minutes in any 1 hour, which is:
  - (1) Darker in shade than that designated as No. 1 (20% density) on the Ringelmann Chart, as published by the United States Bureau of Mines; or
  - (2) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in Section 9.03(a)(1).
- (b) The density or opacity of an air contaminant shall be measured at the point of its emission, except when the point of emission cannot be readily observed, it may be measured at an observable point of the plume nearest the point of emission.
- (c) This section shall not apply when the presence of uncombined water is the only reason for the failure of the emission to meet the requirements of this section.
- (d) This section shall not apply to solid fuel burning devices, permitted fire training facilities, motor vehicles when operated on public roads, aircraft, or equipment subject to Section 9.04.
- (e) This section shall not apply to equipment with an alternate opacity standard issued under Section 3.03 or Section 6.07 that is based upon a correlation with the particulate concentration and that accurately indicates a violation of the applicable particulate emission standards in Section 9.09.

### **SECTION 9.04 OPACITY STANDARDS FOR EQUIPMENT WITH CONTINUOUS OPACITY MONITORING SYSTEMS**

*Adopted 04/09/98 (865)*

- (a) Applicability. This section shall apply to all equipment required to be equipped with a continuous emission monitoring system for opacity.
- (b) It shall be unlawful for any person to cause or allow the operation of any of the following equipment unless equipped with a continuous emission monitoring system for opacity:
  - (1) Cement kilns;

- (2) Clinker coolers;
  - (3) Glass furnaces, rated at greater than 1 ton per hour, that burn fuel;
  - (4) Fuel burning equipment, rated at 100 million Btu per hour or greater, that burns wood, coal, or residual oil; and
  - (5) Refuse burning equipment rated at greater than 12 tons per day.
- (c) It shall be unlawful for any person to cause or allow the emission of any air contaminant from any equipment subject to this section during any hour that:
- (1) Averages greater than 5% opacity; or
  - (2) Contains any consecutive 6-minute period averaging greater than 20% opacity.
- (d) Section 9.04(c)(1) shall not apply to:
- (1) Glass furnaces that are tested annually for compliance with the applicable particulate emission standard in Section 9.09; or
  - (2) Equipment with an alternate opacity standard issued under Section 3.03 or Section 6.07 that is based upon a correlation with the particulate concentration and that accurately indicates a violation of the applicable particulate emission standards in Section 9.09.
- (e) This section shall not apply to sources controlled by a venturi scrubber, provided that:
- (1) The source is tested annually for compliance with the applicable particulate emission standard in Section 9.09;
  - (2) The pressure drop across the scrubber is continuously monitored and recorded; and
  - (3) The scrubbing liquid flow rate and temperature are continuously monitored and recorded.
- (f) This section shall not apply to fuel burning equipment that burns residual oil less than 31 days per year, provided that the source implements an alternate opacity monitoring plan issued under Section 3.03 or Section 6.07.

**SECTION 9.05 REFUSE BURNING** Adopted 03/13/68 (12)  
Revised 06/09/88 (621), 12/09/93 (769)

- (a) It shall be unlawful for any person to cause or allow the burning of combustible refuse except in a multiple chamber incinerator provided with control equipment.



# ASH GROVE CEMENT COMPANY



"WESTERN REGION"

January 22, 1999

Elizabeth Gilpin  
Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle WA 98101-2038

Dear Ms. Gilpin:

**Re: Compliance Status Report dated 12/17/98**

The following is further information as you requested on the excess emissions reported in our CEM from September, 1998. Included is the information already supplied in the original CEM followed by the new information in Bold Face. We hope this is adequate.

## **NO<sub>x</sub> Emissions:**

<u>Date</u>	<u>Time</u>	<u>Hourly Value</u>
09/29/98	21:00	724 ppmc
09/29/98	22:00	979 ppmc
09/29/98	23:00	856 ppmc
09/30/98	00:00	783 ppmc
09/30/98	01:00	759 ppmc

We were unable to operate our coal mills and had to switch unexpectedly to full gas. This unplanned switch in fuels caused instability and high NO<sub>x</sub>. It took the operator several hours to restabilize the kiln by making adjustments to the draft, feed rate and fuel rates. The coal mills were unable to operate because of electrical problems with the control system. An engineer and electrician were called out when the problem was noticed at 21:00. The coal mills were restarted at 01:40 and the main fuel source was gradually switched back to coal. This incident should be excused from penalty under WAC 173-400-107 (6). The event was not caused by poor operation, design or maintenance. As was shown above it was handled in a prompt manner. It is not of a recurring pattern as this in the first event in two years caused by problems with the coal mill control system.

An operator trained in the programming of Allen Bradley PLC's had made some changes in the existing automation program for our coal mills to dampen analog noise to the operator interface. After this, we began receiving erratic analog signals for control of the mills. The changes made by the operator should not have caused the apparent logic error. These changes are made on a routine basis by the process department. After these changes were entered, the original settings were not accepted by the PLC. Reloading an old copy of the program into the PLC solved the short term problem. For the long term solution, the operator was given restrictions of the type of changes he can make to the program.



**Opacity:**

<u>Date</u>	<u>Time</u>	<u>6-Minute Average</u>	<u>1-Hour Average</u>
09/01/98	03:12	20.5 %	6.4 %
09/01/98	03:13	22.5 %	
09/01/98	03:14	23.9 %	

The kiln was in full operation including the baghouse. Through the initial investigation, it was discovered that compartment 10 was causing the problems. This was immediately isolated for repairs.

**A complete change out of all the bags was performed and several cracks to the housing were found and repaired. This compartment had been inspected on 8/24. At that time, a small amount of dust was found on the floor, but no holes were found in either the bags or the housing. At that time, the compartment was cleaned and put back on line with no incident.**

<u>Date</u>	<u>Time</u>	<u>6-Minute Average</u>	<u>1-Hour Average</u>
09/04/98	12:02	21.2 %	5.8 %
09/04/98	12:03	22.9 %	
09/04/98	12:04	24.7 %	

The kiln was in full operation including the baghouse. Through the initial investigation, it was discovered that compartment 10 was causing the problems. During the previous two days, repairs had been done to compartment 10 including a complete bag changeout and repairs to the housing. It was still found to be leaking in the housing.

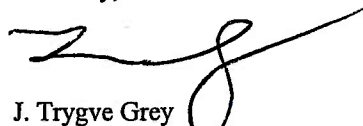
**Additional cracks were found in the flooring and walls. These were repaired and after a complete inspection, the compartment was returned to service.**

<u>Date</u>	<u>Time</u>	<u>6-Minute Average</u>	<u>1-Hour Average</u>
09/05/98	01:44	20.5 %	8.1 %
09/05/98	02:00		8.8 %
09/05/98	03:00		12.4 %
09/05/98	04:00		8.2 %

The kiln was in full operation including the baghouse. Although working adequately under normal operation, there were still problems with compartment 10. The Raw Mill shut down at 01:40 causing a high differential pressure across the baghouse. At this time, compartment 10 was isolated and the kiln was reduced about 15% in production to help.

**Upon inspection, it was found that additional cracks had developed in the housing of the compartment. These repairs were made and a complete inspection was made to the compartment after which it was put back on line. To prevent further a recurrence, a metal thickness gauge will be purchased or other measures will be taken to better monitor the thickness and condition of the floor and walls.**

Sincerely,



J. Trygve Grey  
Process Engineer